

JH Case 1:07-cv-99999 Document 889 Filed 01/14/2008 Page 1 of 1 **FILED**

JANUARY 14, 2008

MICHAEL W. DOBBINS
CLERK, U.S. DISTRICT COURT

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

IRMA PITA,

Plaintiff,

v.

TARGET CORPORATION,

Defendant.

No.:

08 C 312

JUDGE KENNELLY
MAGISTRATE JUDGE NOLAN

NOTICE OF REMOVAL

Target Corporation, the defendant in the above entitled cause, seeks removal to this court and, in support thereof, alleges as follows:

1. This action was commenced against Target Corporation, the sole defendant in the Circuit Court of Cook County, Illinois on July 11, 2007. A copy of the Complaint was served on the defendant on July 31, 2007.


2. At the time the action was commenced and since then, the plaintiff has reported to Target that she resides at 2250 S. 17th Avenue in the City of North Riverside, County of Cook, State of Illinois and the defendant was and is a corporation organized and existing under the laws of the State of Minnesota with its principal place of business in Minneapolis, Minnesota.

3. The amount in controversy exceeds \$75,000, exclusive of interest and costs, as appears from "other papers" which have been filed by plaintiff's attorney in their answers to interrogatories filed on December 26, 2007. These interrogatory answers reference medical bills that exceed \$130,000.00, which include surgeries on plaintiff's cervical spine, lumbar spine and right shoulder. Copies of which are attached hereto and marked as **Group Exhibit 1**.

4. This action is a civil one of which the United States district courts have original jurisdiction under 28 USC § 1332.

5. The defendant attaches to this notice copies of all process, pleadings, and orders that have been served on it as **Group Exhibit 2**.

WHEREFORE, the defendant prays that this cause be removed to the United States District Court for the Northern District of Illinois.

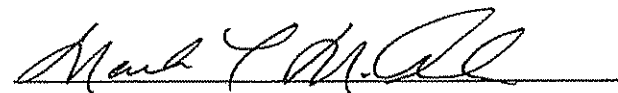
By 
Mark T. McAndrew
Attorney for Defendant
Target Corporation

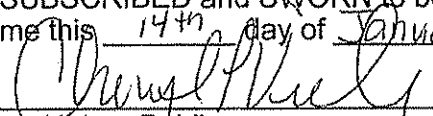
Hennessy & Roach, P.C.
140 South Dearborn, 7th Floor
Chicago, Illinois 60603
(312) 346-5310
Attorney No.: 30973

STATE OF ILLINOIS)
) ss.
COUNTY OF COOK

Mark T. McAndrew, being first duly sworn on oath, deposes and says that:

1. He is the attorney for the defendant-petitioner in this cause;
2. He has prepared and read the petition for removal filed in this cause and has personal knowledge of the facts and matters contained in it; and
3. The facts and allegations contained in the petition for removal are true and correct.



SUBSCRIBED and SWORN to before
me this 14th day of January, 2008.

Notary Public

